

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Stacey A. Bell
James H. Rollinson
Melissa L. Kosack

Hearing Date: March 28, 2018 at 10:00 a.m.

Objection Deadline: March 14, 2018 at 4:00 p.m.

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY
PROCEEDINGS LISTED ON EXHIBIT A,¹

Defendants.

Adv. Pro. Nos. listed on Exhibit A

**NOTICE OF MOTION FOR AN ORDER ESTABLISHING OMNIBUS
PROCEEDING FOR THE PURPOSE OF DETERMINING THE EXISTENCE,
DURATION, AND SCOPE OF THE PONZI SCHEME AT BLMIS**

¹ See Exhibit A, Schedule of Remaining Good Faith Actions, annexed to the Trustee's Motion.

PLEASE TAKE NOTICE that Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities, LLC and the estate of Bernard L. Madoff, by and through the Trustee’s undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, Courtroom 723, New York, New York 10004, on **March 28, 2018 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, for an Order Establishing an Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS (the “Motion”).

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, if any, must be in writing, shall conform to the Bankruptcy Rules and other applicable rules and orders of this Court, and shall be filed in accordance with General Order M-399 and the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York (available at www.nysb.uscourts.gov) by no later than **March 14, 2018 at 4:00 p.m.** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon: (a) Baker & Hostetler LLP, Counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan and Stacey A. Bell; and (b) Securities Investor Protection Corporation, 1667 K Street, N.W., Suite 1000, Washington, D.C. 20006-1620, Attn: Kevin H. Bell. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any

party or an opportunity to be heard.

Dated: New York, New York
February 23, 2018

By: /s/Stacey A. Bell

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Stacey A. Bell
Email: sbell@bakerlaw.com
Melissa L. Kosack
Email: mkosack@bakerlaw.com

Key Tower, 127 Public Square, Suite 2000
Cleveland, OH 44114-1214
Telephone: (216) 861-7075
Facsimile: (216) 696-0740
James H. Rollinson
Email: jrollinson@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and the
Estate of Bernard L. Madoff*